

**CLARK HILL PLLC**

PAOLA M. ARMENI, ESQ.

Nevada Bar No. 8357

E-mail: [parmeni@clarkhill.com](mailto:parmeni@clarkhill.com)

TIFFANY SOLARI, ESQ.

Nevada Bar No. 16003

E-mail: [tsolari@clarkhill.com](mailto:tsolari@clarkhill.com)

1700 S. Pavilion Center Dr., Suite 500

Las Vegas, Nevada 89135

Telephone: (702) 862-8300

Facsimile: (702) 778-9709

*Attorney for Plaintiffs, Morgan Family*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BONNIE LOPEZ, individually as sister and  
for the Estate of MELODY MORGAN,  
deceased; COLLEEN LACKEY, individually  
as mother of MELODY MORGAN, deceased,

Plaintiffs,

vs.

THE STATE OF NEVADA ex rel. NEVADA  
DEPARTMENT OF CORRECTIONS,  
WARDEN DWIGHT NEVEN, individually;  
GARY PICCININI, ASSISTANT WARDEN,  
individually; BRYAN SHIELDS,  
individually; OFFICER KARISSA  
CURRIER; OFFICER JAZMINA  
FLANIGAN; NURSE JANE BALAO;  
NURSE BRIGIDO BAYAWA; NURSE  
LEILANI FLORES; NURSE ROSEMARY  
MCCRARY; NURSE MA LITA  
SASTRILLO; NURSE CHRIS SHIELDS;  
DOES I through X; and ROE ENTITIES I  
through X, inclusive,

Plaintiffs.

CASE NO.: 2:21-cv-01161-ART-NJK

**ORDER TO EXTEND DEADLINE FOR  
PLAINTIFFS TO FILE THEIR REPLY  
TO DEFENDANTS' DWIGHT NEVEN  
AND GARY PICCININI'S  
OPPOSITION TO PLAINTIFF  
MORGAN FAMILY'S MOTION TO  
COMPEL RESPONSES TO REQUEST  
FOR PRODUCTION NO. 1 [ECF 151]  
(1st Request)**

Plaintiffs BONNIE LOPEZ, individually as sister and for the estate of MELODY  
MORGAN, deceased; and COLLEEN LACKEY, individually as mother of MELODY  
MORGAN, deceased, (collectively, "Morgan Family"), by and through their counsel, Paola M.

1 Armeni, Esq., and Tiffany Solari, Esq., of the law firm of Clark Hill, PLLC; and Defendants Gary  
2 Piccinini, and Dwight Neven, by and through their counsel, Jessica E. Whelan, Esq., Marni  
3 Watkins, Esq. and Lorin M. Taylor, Esq. of the Office of the Attorney General of the State of  
4 Nevada, hereby respectfully submit this Stipulation and Order Extending Time for Plaintiffs to file  
5 a reply to Defendants' Dwight Neven and Gary Piccinini's Opposition to Plaintiff Morgan  
6 Family's Motion to Compel Responses to Request for Production No. 1 [ECF 151], with a current  
7 deadline of August 8, 2023. The parties are respectfully requesting that the Court extend the  
8 deadline for the Plaintiffs to reply to the Opposition for an additional seven (7) days, up to and  
9 including August 15, 2023.

10 Although Plaintiffs' counsel has been diligently working on replying to Defendants'  
11 Dwight Neven and Gary Piccinini's Opposition, counsel requires a short extension to complete the  
12 Reply. This request for extension is made in good faith and not for the purposes of delay.

13 //

14  
15 //

16  
17 //

18  
19 //

20  
21 //

22  
23 //

24  
25 //

26  
27 //

28

WHEREFORE, the parties stipulate that the time for Plaintiffs to file their Reply to NDOC Defendants' Response to Plaintiffs' Motion to Compel be extended an additional seven (7) days up to and including August 15, 2023.

APPROVED AS TO FORM AND CONTENT on the 4<sup>th</sup> day of August 2023:

CLARK HILL, PLLC

/s/ Paola M. Armeni

PAOLA M. ARMENI, ESQ.

Nevada Bar No. 8357

TIFFANY SOLARI, ESQ.

Nevada Bar No. 16003

1700 S. Pavilion Center Drive, Suite #500

Las Vegas, Nevada 89135

*Attorneys for Plaintiffs, Morgan Family*

OFFICE OF THE ATTORNEY GENERAL  
AARON FORD, Attorney General

/s/ Jessica E. Whelan

MARNI WATKINS, ESQ.

Nevada Bar No. 9674

JESSICA E. WHELAN, ESQ.

Nevada Bar No. 14781

LORIN M. TAYLOR, ESQ.

Nevada Bar No. 14958

555 East Washington Ave. Ste. 3900

Las Vegas, Nevada 89101

*Attorneys for Defendants Gary Piccinini,  
Bryan Shields, Dwight Neven, Jane Balao,  
Rosemarie McCrary, Chris Shields,  
and Nevada Department of Corrections*

**ORDER**

**IT IS SO ORDERED:**

  
UNITED STATES MAGISTRATE JUDGE

Dated: August 7, 2023